

# Defense Exhibit 2

1 THE COURT: All right.

2 BY MR. COHEN:

3 Q Can you look at Page 3. That's Chapter 13.

4 It references threats to Mr. Patel, but it looks like  
5 financial threats, not violent threats, correct?

6 A That's correct.

7 Mr. Patel said that early on -- well, there was also  
8 physical threats. But early on the threat was if you don't  
9 provide me additional money, then all of your money will be  
10 lost.

11 Q Okay. The physical threats, were those put into the  
12 Indictment?

13 A I --

14 Q That you're aware of.

15 A Not that I'm aware of.

16 MR. COHEN: Okay.

17 I have no other questions, Your Honor.

18 THE COURT: Any redirect?

19 MS. RICHARDSON-JONES: No, No, Your Honor.

20 THE COURT: You can step down, Special Agent.

21 Any other witnesses for the Government?

22 MS. RICHARDSON-JONES: No, Your Honor.

23 THE COURT: Mr. Cohen.

24 MR. COHEN: I have two witnesses.

25 Our first one is Ann Marie, and her last name is

1 A Good morning.

2 Q Let me ask you, are you aware of an Allen Cox?

3 A I am.

4 Q Okay. And are you aware that there was -- there was

5 an agreement that Mr. Watson had drawn up to repay Allen

6 Cox for the festival that -- from Southfork Ranch?

7 A I was not aware of that until I saw it.

8 Q But you saw the repayment agreement that looks like

9 he's trying to pay back the money, correct?

10 A I did see that.

11 Q Okay. And are you aware of how many festivals

12 Mr. Watson has put on in the past?

13 A Put on --

14 Q Just in general?

15 A Not exact number, no.

16 Q Are you aware of how many of these festivals were

17 successful in the past?

18 A No.

19 Q Okay. As far as -- and you read the Indictment out of  
20 Texas, correct?

21 A I did.

22 Q And when you're talking about Mr. Patel and threats,  
23 on page -- I don't know if you have the Indictment in front  
24 of you. I can --

25 MR. COHEN: Can I give him my copy, Your Honor?